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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ANGELINA ATABEKOVA-  
MICHAELIDIS, and VARDOUNI  
MICHAELIDOU; both individually and  
as successors in interest to Decedent  
MELKON MICHAELIDIS,

Plaintiffs,

v.

CITY OF LOS ANGELES; and  
BRYAN MORALES,

Defendants.

Case No. 2:22-cv-05620-MCS-MAA

[*Honorable Mark C. Scarsi*]

**JOINT STATUS REPORT OF THE  
PARTIES IN RESPONSE TO  
ORDER SHOW CAUSE [DOC. 108]**

**TO THE HONORABLE COURT:**

Plaintiffs ANGELINA ATABEKOVA-MICHAELIDIS, and VARDOUNI  
MICHAELIDOU; both individually and as successors in interest to Decedent  
MELKON MICHAELIDIS (“Plaintiffs”) and Defendants CITY OF LOS  
ANGELES and OFFICER BRYAN MORALES (“Defendants”) hereby respond to  
the Court’s Order to Show Cause of January 23, 2024 [Doc. 108].

The parties apologize to the Court for the inconvenience and appreciate the  
Court’s patience as the parties resolved this matter. As the Court can see below, the  
parties have worked diligently to resolve this matter.

1 Plaintiffs and Defendants, by and through their respective attorneys of  
2 record, reached a conditional settlement on or about October 6, 2023.

3 On October 6, 2023, the parties filed their Notice of Settlement of this  
4 matter, which required approval of certain governing bodies of the City of Los  
5 Angeles. It was understood by the parties at that time that those approvals would  
6 take no longer than 90 days. Thus, the parties informed the Court of the time  
7 expected to finalize and the party's intent to file a dismissal with prejudice within  
8 10 days of receipt of the settlement funds. (Doc. 104.)

9 On October 27, 2023, Defendants provided a draft settlement agreement and  
10 release for Plaintiffs' review. For the following approximately 45 days, due to a  
11 few unanticipated issues with the settlement agreement and release, the parties  
12 negotiated the language of the agreement and satisfied any internal issues with the  
13 agreement. On December 19, 2023, Plaintiffs provided the executed agreement to  
14 Defendants and awaited Defendants' signatures and approvals.

15 For approval by the City of Los Angeles, the conditional settlement was  
16 taken to the Claims Board on February 26, 2024 for approval. Although there was  
17 a meeting of the Claims Board on February 5, 2024, counsel for Defendants were  
18 engaged in trial and could not attend the mandatory in-person appearance. The  
19 February 26, 2024 was the first Claims Board meeting following the final  
20 execution of the settlement agreement on December 19, 2023 that counsel for  
21 Defendants was able to appear for in-person. The matter went before the City  
22 Council on February 26, 2024, and the Council approved the settlement at that time  
23 and referred the matter to the Budget Finance & Innovation committee for the next  
24 round of approval.

25 Counsel for Defendants again appeared in-person at the Budget Finance &  
26 Innovation committee on or about March 20, 2024. The Budget Finance &  
27 Innovation committee approved the settlement and referred the matter to the full  
28 City Council for approval. The City Council approved the settlement on or about

1 April 3, 2024 and referred the matter to the Mayor for final approval. The Mayor  
2 had 10 days to approve or veto the settlement, and once the 10-day period expired  
3 on or about April 13, 2024, the City Attorney's office is tasked with issuing the  
4 settlement check. Defense counsel has been advised that the issuing of the check  
5 could take two to three weeks after the Mayor's final approval.

6 All necessary approvals have been made by the governing bodies. All that  
7 remains is the processing of the check followed by the dismissal of this action.  
8 Defendants have fully executed the settlement agreement with Plaintiffs and all  
9 that remains in this case is the issuance of the check. The City has multiple rounds  
10 of settlement approval and the delay in having the conditional settlement fully  
11 approved is not due to any willful delay by the City or defense counsel.

12 Defendants anticipate that the City Attorney's office will process and mail  
13 the check by the end of April 2024. The City could not give the parties a specific  
14 date.

15 Under the circumstances, Plaintiffs do not feel that there was anything they  
16 could have done to speed up the process. Plaintiffs relied on the City's  
17 representations of what was necessary to approve the settlement. Of course, if there  
18 was a way for the process to be expedited, it would be in Plaintiffs' favor and  
19 Plaintiffs would graciously comply with whatever that process may be, if any.

20 In reliance on the City's assurance that the check will be issued by the end of  
21 this month, which typically takes 5 business days to be delivered and an additional  
22 5 business days for the bank to verify and clear, the parties respectfully request that  
23 the Court allow the parties to file their Stipulation for Dismissal with Prejudice on  
24 or before May 15, 2024.

25  
26 Respectfully submitted,

27 DATED: April 23, 2024

**LAW OFFICES OF DALE K. GALIPO  
MARDIROSIAN & MARDIROSIAN, PLC**

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By: /s/ Marcel F. Sincich  
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DATED: April 23, 2024

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